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Attorneys for Plaintiffs and Judgment Creditors

**IN THE FIFTH JUDICIAL DISTRICT COURT
IN AND FOR WASHINGTON COUNTY, STATE OF UTAH**

ST. LUKE’S HEALTH SYSTEM, LTD.; ST.
LUKE’S REGIONAL MEDICAL CENTER,
LTD.; CHRIS ROTH; NATASHA
ERICKSON, M.D.; and TRACY
JUNGMAN, N.P.;

Plaintiffs and Judgment Creditors,

v.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE’S RIGHTS NETWORK, a
political organization and an unincorporated
association;

Defendants and Judgment Debtors.

**EX PARTE MOTION FOR
SUPPLEMENTAL PROCEEDING:
HEARING TO IDENTIFY JUDGMENT
DEBTOR’S PROPERTY**

**[Hearing Requested Pursuant to
Rule 64(c)]**

Case No. 246501034

Judge Eric A. Ludlow

St. Luke’s Health System Ltd. (“SLHS”) and St. Luke’s Regional Medical Center, Ltd.
 (“SLRMC,” and collectively with SLHS, “St. Luke’s”), Chris Roth (“Mr. Roth”), Dr. Natasha D.
 Erickson (“Dr. Erickson”), and Tracy W. Jungman, NP (“NP Jungman”) (collectively “St.
 Luke’s Parties” or “Plaintiffs” or “Judgment Creditors”), by and through their attorneys of
 record, Holland & Hart LLP, hereby submit this Ex Parte Motion for a hearing to identify the

location of assets, accounts, and property of the Defendants/Judgment Debtors Ammon Bundy (“Bundy”), Ammon Bundy for Governor (“Bundy Campaign”), Peoples Right Network (“PRN”), and Lisa Bundy (collectively “Defendants” or “Judgment Debtors”).

The Defendants and Judgment Debtors have not satisfied the Judgment in this case. Plaintiffs do not have enough information about the Defendants’ assets, accounts, and other property to fully collect and execute on the Judgment. Pursuant to Rule 64(c)(2) of the Utah Rules of Civil Procedure, the court “may conduct hearings as necessary to identify property and to apply the property toward the satisfaction of the judgment or order.” In such supplemental proceedings, “[w]itnesses may be subpoenaed to appear, testify and produce records” and “[t]he court may permit discovery.” *Id.* Accordingly, Plaintiffs move the Court to schedule a hearing and order the Judgment Debtors and Defendants to appear and answer under oath questions about their property and to bring to the hearing all records about employment, bank accounts, vehicles, real property, business entities, and any other property in which the Judgment Debtors and Defendants have an interest. Plaintiffs also move the Court to order the Defendants and Judgment Debtors not to sell, transfer, or dispose of their non-exempt property. A proposed order is attached contemporaneously herewith.

DATED this 22nd day of April, 2024.

HOLLAND & HART LLP

/s/ Darren G. Reid

Darren G. Reid

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2024, I caused to be electronically filed the foregoing
**EX PARTE MOTION FOR SUPPLEMENTAL PROCEEDING: HEARING TO
IDENTIFY JUDGMENT DEBTOR'S PROPERTY** with the Clerk of the Court using the
GreenFiling system.

/s/ Christa L. Fries

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The Order of the Court is stated below:

Dated: May 10, 2024
12:01:16 PM

At the direction of:

/s/ ERIC A LUDLOW
District Court Judge

by

/s/ SHAWNA YOUNG
District Court Clerk

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PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association;

Defendants and Judgment Debtors.

**ORDER GRANTING EX PARTE
MOTION FOR SUPPLEMENTAL
PROCEEDING: EXAMINATION TO
IDENTIFY JUDGMENT DEBTORS'
PROPERTY**

Case No. 246501034

Judge Eric A. Ludlow

Having reviewed the Ex Parte Motion for Supplemental Proceeding: Hearing to Identify
Judgment Debtor's Property (the "Motion"), and for good cause otherwise appearing, the Court
hereby ORDERS that the Motion is GRANTED.

1. Judgment Creditors obtained a \$51,928,306.20 judgment and permanent injunction (the “Judgment”) against the above-named Defendants and Judgment Debtors in Idaho state court. Judgment Creditors filed a certified and exemplified copy of the Judgment on October 13, 2023, in the Third Judicial District Court, in and for Salt Lake County, State of Utah; and Plaintiffs filed another certified and exemplified copy of the Judgment on April 15, 2024, in this Fifth Judicial District Court.
2. The Judgment Debtors have not satisfied the Judgment.
3. Judgment Creditors do not have enough information about the Judgment Debtors’ property and assets to fully collect the judgment.
4. The Answers to Questions About Judgment Debtors’ Property form is likely to gather the information needed to collect the judgment.
5. If the Judgment Debtors—including, specifically, Ammon Bundy and People’s Rights Network—serve the Judgment Creditors with filled-out versions of the attached Answers to Questions about Judgment Debtors’ Property form at least three (3) days before the Debtors’ Examination, and if the Judgment Creditors are satisfied that the Judgment Debtors have answered the questions fully and truthfully, the Judgment Creditors shall cancel the Debtors’ Examination and notify the Debtors and the Court. Otherwise, the Judgment Debtors must attend the Debtors’ Examination at counsel’s office.

6. The Judgment Debtors must not sell, transfer, dissipate, or otherwise dispose of any non-exempt property. See Utah Code§ 78B-5-501 to -513 (listing exempt property).
7. If the Judgment Debtors fail to comply with this order, the Court may impose sanctions against Judgment Debtors under Rule 7A of the Utah Rules of Civil Procedure.

Judgment Debtors Take Notice:

The court has scheduled a Debtors' Examination for Ammon Bundy and People's Rights Network with the Judgment Creditors' counsel, Holland & Hart LLP, at the following date, time, and location:

Snow Jensen & Reece, P.C.

912 West 1600 South, Suite B200

St. George, UT 84770

June 20, 2024 at 9:00 am

SO ORDERED.

In accordance with Utah R. Civ. P. 10(e) and Utah State District Courts Efiling Standard No. 4, this Order does not bear the handwritten signature of the Court, but instead displays an electronic signature at the top of the first page of this Order.